

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

EARL GAVIN,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC.; TRANS UNION LLC; and
EQUIFAX, INC.,

Defendants.

Case No. 7:18-cv-00523-AMQ-JDA

APPLICATION/AFFIDAVIT FOR *PRO HAC VICE* ADMISSION

- (1) **Name:** James P. Acosta
- (2) **Residence:** I reside in the following state: Texas
- (3) **Business Address:** I am an attorney and practice law under the name of or as a member of the following firm:

Firm name: Quilling, Selander, Lownds, Winslett & Moser, P.C.
Mailing address: 6900 Dallas Parkway, Suite 800, Plano, TX 75024
Telephone number: (214) 560-5440
Facsimile number: (214) 871-2111
E-mail address: jacosta@qslwm.com
(Application will not be considered without an e-mail address to receive electronic notification.)
- (4) **Jurisdiction of this Court.** I, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of South Carolina, with all applicable federal statutes, laws, and rules, including Local Rules of the United States District Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local Criminal Rule 57.I.08). I consent to the jurisdiction of the United States District Court for the District of South Carolina in all matters of attorney conduct.
- (5) **Regular Practice of Law.** I am a member in good standing of the bar of the Highest Court of the State of Texas where I regularly practice law. **Attached is my certificate of good standing.**

- (6) **Additional Bar Membership.** I have been admitted to practice before the following courts:

COURT	ADMITTED	GOOD STANDING
U.S. District Court – Northern District of Texas	02/23/1998	Yes
U.S. District Court – Eastern District of Texas	07/03/2001	Yes
U.S. District Court - District of Colorado	04/18/2018	Yes

By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

- (7) **Pending Disciplinary Matters.** Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures?
 ☐ Yes ☒ No
 (If “yes,” give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.)

- (8) **Curtailment of Prior *Pro Hac Vice* Admissions.** Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked?
☐ Yes ☒ No
 (If “yes,” give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)

- (9) **Sanctions.** Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?
☐ Yes ☒ No
 (If “yes,” give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)

- (10) **Criminal Sanctions.** Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?
☐ Yes ☒ No

(If “yes,” give particulars, such as date, court, judge, circumstances, and ultimate disposition.)

- (11) **Present and Previous *Pro Hac Vice* in this Court.** Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?

☐ Yes ☒ No

(If “yes,” give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.

- (12) **Designated Local Counsel.** Local counsel of record associated with Applicant in this case is:

Attorney Name: Wilbur E. Johnson

Firm Name: Young Clement Rivers, LLP

Street Address or Post Office Box: 25 Calhoun Street, Suite 400,

City, State, and Zip Code: Charleston, SC 29401

Telephone Number: (843) 724-6659

E-Mail Address: wjohnson@ycrlaw.com

I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

- (13) **Associated Counsel.** In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.
- (14) **Application Fee.** I affirm that the application fee of two hundred and fifty dollars (\$250) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.
- (15) **Electronic Notification.** By submitting this application, I consent to electronic notification.

(16) **Represented Party/Parties.** I seek to represent the following party/parties:

Trans Union LLC

(17) **I certify that I have read Local Civil Rule 30.04 regarding the conduct of depositions.**



JAMES P. ACOSTA

Texas Bar No. 24001622

jacosta@qslwm.com

QUILLING, SELANDER, LOWNDS,
WINSLETT & MOSER, P.C.

6900 Dallas Parkway, Suite 800

Plano, TX 75024

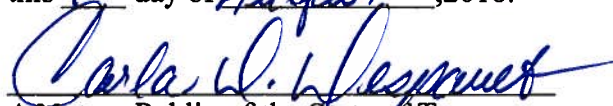
(214) 560-5440

(214) 871-2111 Fax

Counsel for Trans Union LLC

Sworn to and subscribed before me

this 9th day of August, 2018.



A Notary Public of the State of Texas

My Commission expires: _____



The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

James Paul Acosta

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 7th day of November, 1997.

I further certify that the records of this office show that, as of this date

James Paul Acosta

is presently enrolled with the State Bar of Texas as an active member in good standing.

IN TESTIMONY WHEREOF witness my signature



and the seal of the Supreme Court of Texas at the City of Austin, this, the 8th day of August, 2018.

BLAKE HAWTHORNE, Clerk

Blake A. Hawthorne
Clerk, Supreme Court of Texas

No. 7985C.1